

June 26, 2002

Mr. James Rogers
Sun Packaging, Inc.
17728 Sun Park Drive
Westfield, IN 46074-9536

Re: 057-16087-00047
Minor Permit Revision to
FESOP 057-6168-00047

Dear Mr. Rogers:

Sun Packaging, Inc. was issued a federally enforceable state operation permit (FESOP) on October 17, 2000 for a paper bag manufacturing plant located at 17728 Sun Park Drive, Westfield, IN 46074-9536. A request to modify the permit was received on June 5, 2002. The request was made to remove two conditions which are not applicable. Pursuant to the provisions of 326 IAC 2-8-11.1(d)(1) a minor permit revision is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-8-11.1, FESOP 057-6168-00047 shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this revision and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Allen R. Davidson at (800) 451-6027, press 0 and ask for extension 3-5693, or dial (317) 233-5693.

Sincerely,

Original Signed Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
ARD

cc: File - Hamilton County
U.S. EPA, Region V
Hamilton County Health Department
Air Compliance Section Inspector - Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Sun Packaging, Inc.
17728 Sun Park Drive
Westfield, Indiana 46074**

Sun Packaging, Inc. is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F 057-6168-00047	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: October 17, 2000
First Administrative Amendment 057-12833-00047 Issuance Date: November 8, 2000	
First Minor Permit Modification 057-16087-00047	Pages Amended: 18, 21
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 26, 2002

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SECTION A

SOURCE SUMMARY

A.1 General Information

The Permittee owns and operates a flexographic printing source.

Responsible Official: James D. Rogers
Source Address: 17728 Sun Park Drive, Westfield, Indiana 46074
Mailing Address: 17728 Sun Park Drive, Westfield, Indiana 46074
SIC Code: 2673
County Location: Hamilton
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, PSD Rules;
Minor Source, Part 70 Permit Program

A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

- a) one (1) flexographic printing press, known as press #1, capacity: 750 feet per minute.
- b) one (1) flexographic printing press, known as press #2, capacity: 700 feet per minute.
- c) one (1) flexographic printing press, known as press #3, capacity: 195 feet per minute.

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- b) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- c) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- d) Closed loop heating and cooling systems.
- e) Paved and unpaved roads and parking lots with public access.
- f) Stationary fire pumps.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)
The permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

B.2 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the meaning assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11 (prior to July 1, 1996, IC 13-7-2, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]
This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-5-5-3 (prior to July 1, 1996, IC 13-7-10-2.5), of the permit.

B.4 Enforceability [326 IAC 2-8-6]
a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9]
The expiration of this permit terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-7.

B.6 Severability [326 IAC 2-8-4(4)]
a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management,
Permits Branch, Office of Air Quality,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
b) The Permittee shall also provide additional information as requested by IDEM, OAQ, to determine the compliance status of the source in accordance with 326 IAC 2-8-5(a).

- c) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that the IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- d) Upon written request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to both the U.S. EPA and IDEM, OAQ, along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR Part 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAQ).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - 1) enforcement action;
 - 2) permit termination, revocation and reissuance or modification; and
 - 3) denial of a permit renewal application.
- b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)]

Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, and work practices. The certification shall be submitted July 1 to:

Indiana Department of Environmental Management,
Compliance Data Section, Office of Air Quality,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- b) This annual compliance certification report required by this permit shall be timely if:
 - 1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - 2) Delivered by any other method if it is received and stamped by IDEM, OAQ, on or before the date it is due.
- c) The annual compliance certification report shall include the following:
 - 1) The identification of each term and condition of this permit that is the basis of the certification;
 - 2) The compliance status;
 - 3) Whether compliance was continuous or intermittent;
 - 4) The methods used for determining the compliance status of the source, currently and over the reporting period; and
 - 5) Such other facts as IDEM, OAQ, may require to determine the compliance status of the source.

B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

- a) The Permittee shall prepare, maintain and implement operation and Preventive Maintenance Plans as necessary including the following information on each:
 - 1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - 2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - 3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - 4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - 5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- b) Preventive Maintenance Plans shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.14 Emergency Provision [326 IAC 2-8-12]

- a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided as follows:
- b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- 1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- 2) The permitted facility was at the time being properly operated;
- 3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements of this permit;
- 4) The Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency occurrence by telephone or facsimile;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality) or,

Telephone No.: 317-233-0178

Facsimile No.: 317-233-5967

- 5) The Permittee submitted written notice or by facsimile of the emergency to:

Indiana Department of Environmental Management,
Compliance Branch, Office of Air Quality,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency. The notice shall fulfill the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- A) A description of the emergency;
- B) Any steps taken to mitigate the emissions; and
- C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

- 6) The Permittee immediately took all reasonable steps to correct the emergency.
- c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- d) This emergency provision supersedes any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- e) IDEM, OAQ, may require that the preventive maintenance plan required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- f) Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- g) Operations may continue during an emergency only if the following conditions are met:
 - 1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - 2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - A) the Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - B) continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in clause (B) above.

- B.15 Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]
Deviations from requirements, (for emergencies see Condition B.14 - Emergency Provision) the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management,
Compliance Branch, Office of Air Quality,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms.

- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8(a)]
[326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]

- a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

- b) This permit shall be reopened and revised under any of the circumstances listed in IC 15-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) or if the commissioner determines any of the following:
 - 1) That it contains a material mistake.
 - 2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - 3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practical. [326 IAC 2-8-8(b)]
- d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management,
Permits Branch, Office of Air Quality,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- b) Timely Submittal of Permit Renewal [326 IAC 2-5-3]
 - 1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - B) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - C) Delivered by any other method if it received and stamped by IDEM, OAQ, on or before the date it is due.

- 2) If IDEM, OAQ fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
 - c) **Right to Operate After Application of Renewal** [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.
- B.18 Administrative Permit Amendment [326 IAC 2-8-10]
- a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
 - b) An administrative permit amendment may be made by IDEM, OAQ, consistent with the procedures specified under 326 IAC 2-8-10(b).
 - c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]
- a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
 - b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
 - c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
 - d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAQ takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]
- B.20 Significant Permit Modification [326 IAC 2-8-11(d)]
- a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.

- b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by the U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]
Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable FESOP's, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable implementation plan (SIP) or in applicable requirements promulgated by the U.S. EPA.

B.22 Operational Flexibility [326 IAC 2-8-15]

- a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- 1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- 2) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions);
- 3) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- 4) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review. Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).

- b) For each such change, the required written notification shall include the following:
 - 1) A brief description of the change within the source;
 - 2) The date on which the change will occur;
 - 3) Any change in emissions; and
 - 4) Any permit term or condition that is no longer applicable as a result of the change.
- c) Emission trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(c).
- d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7) and subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(d)

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

B.23 Construction Permit Requirement [326 IAC 2-1]

Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Quality (OAQ)

B.24 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of IDEM identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d) Sample or monitor, at reasonable times, substances or parameters for the purpose of demonstrating compliance with this permit or applicable requirements; and
- e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of demonstrating compliance with this permit or applicable requirements. [326 IAC 2-8-5(a) (4)]

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- a) The Permittee shall pay annual fees to IDEM, OAQ, consistent with the fee schedule established in 326 IAC 2-8-16.
- b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAQ or in a time period that is consistent with the payment schedule issued by IDEM, OAQ.
- d) If the Permittee does not receive a bill from IDEM, OAQ, thirty (30) calendar days before due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-0179 (ask for OAQ, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following:

- a) Visible emissions shall not exceed an average of 40 percent opacity in 24 consecutive readings,
- b) Visible emissions shall not exceed 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.3 Open Burning

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].
- C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated and maintained.
 - b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
 - c) The permittee shall perform all necessary maintenance and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times.

Compliance Monitoring [326 IAC 2-8-5(a)(1)]

- C.7 Compliance Monitoring [326 IAC 2-8-4(3)]
Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any additional monitoring no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management,
Compliance Data Section, Office of Air Quality,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved. The notification shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

- C.8 Maintenance of Monitoring Equipment [326 IAC 1-6]
The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all required monitoring equipment in proper operating condition at all times. In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. Preventive maintenance plans of the monitors shall be implemented. In addition prompt correction, as indicated, shall be initiated within the time frames specified, whenever the parameters monitored fall outside of the indicated values.

C.9 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR Part 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.10 Pressure Gauge Specifications

Whenever a condition in this permit requires the taking of pressure drop across any part of the unit or its control device the gauge employed shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within ± 2 percent of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

Corrective Actions [326 IAC 2-8-4(1)] [326 IAC 2-8-5(1)]

C.11 Failure to Take Corrective Action

For each unit for which parametric monitoring is required, appropriate corrective actions as described in the Preventive Maintenance Plan shall be taken when indicated by monitoring information. Failure to take corrective action following an excursion of a surrogate monitoring parameter within the prescribed time will constitute a violation of the permit unless taking the corrective action set forth in the Plan would be unreasonable.

After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:

- a) Providing that prompt action was taken to correct the monitoring equipment, that the monitoring equipment malfunctioned, giving a false reading; or
- b) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
- c) An automatic measurement was taken when the process was not operating; or
- d) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.

Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

Whenever the results of the stack test performed in conformance with Condition C.6 - Performance Testing, of this permit exceed the level specified in any condition of this permit, appropriate corrective actions shall be submitted to IDEM-OAQ within 30 (thirty) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAQ that they are not acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.

A second test to demonstrate compliance shall be performed within 120 days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting [326 IAC 2-8-4(3)]

C.13 Emission Reporting [326 IAC 2-6]

[This condition has been removed from the permit.]

C.14 Monitoring Data Availability

All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions. Records shall be kept of the times that the equipment is not operating. If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality. If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5 percent of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

C.15 General Record Keeping Requirements

- a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one hour upon verbal request of an IDEM, OAQ representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two years providing they are made available within

thirty (30) days after written request.

b) Records of required monitoring information shall include:

- 1) The date, place, and time of sampling or measurements;
- 2) The dates analyses were performed;
- 3) The company or entity performing the analyses;
- 4) The analytic techniques or methods used;
- 5) The results of such analyses; and
- 6) The operating conditions existing at the time of sampling or measurement.

c) Support information shall include:

- 1) Copies of all reports required by this permit;
- 2) All original strip chart recordings for continuous monitoring instrumentation;
- 3) All calibration and maintenance records;
- 4) All preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it;
- 5) Relevant work purchases orders;
- 6) Quality assurance and quality control procedures;
- 7) Operator's standard operating procedures;
- 8) Manufacturer's specifications or their equivalent; and
- 9) Equipment "troubleshooting" guidance.

C.16 General Reporting Requirements

a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management,
Compliance Data Section, Office of Air Quality,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if:

- 1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - 2) Delivered by any other method if it is received and stamped by IDEM, OAQ, on or before the date it is due.
- c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

One (1) flexographic printing press, known as press #1, capacity: 750 feet per minute
One (1) flexographic printing press, known as press #2, capacity: 700 feet per minute
One (1) flexographic printing press, known as press #3, capacity: 195 feet per minute

Emissions Limitations [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound

- a) The input of volatile organic compound (VOC) emissions to each of the three (3) printing presses shall not exceed 2.00 tons per month. Therefore, the requirements of 326 IAC 2-7, 326 IAC 8-1-6 and 326 IAC 8-5-5 do not apply.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.4 Visible Emissions Notations

[This condition has been removed from the permit.]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.5 Volatile Organic Compound (VOC) Usage

The Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this permit. The records shall contain a minimum of the following:

- a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- b) The VOC content (weight percent) of each material used;
- c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable; and

D.1.6 Quarterly Reporting

A quarterly summary to document compliance with operation condition number D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

Sun Packaging, Inc.
Westfield, Indiana
Permit Reviewer: MES

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State Form 477378 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Sun Packaging, Inc.
Source Address: 17728 Sun Park Drive, Westfield, Indiana 46074
FESOP No.: F 057-6168-00047

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Relocation Notification
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORTING FORM
(For Control Equipment Monitoring Only)**

Source Name: Sun Packaging, Inc.
Source Address: 17728 Sun Park Drive, Westfield, Indiana 46074
FESOP No.: F 057-6168-00047

A separate copy of this report must be submitted for **each** monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.

Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
9 Continuously	9 Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 pounds per square inch pressure drop)	
Report Covers From: (date: month/day/yr)	To:
9 No Deviations from the Parameter Restriction/Range Occurred During the Monitoring Period. Complete Records Maintained at the Facility Verify Compliance with this Condition.	
9 Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ([2]/[1]x100)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

Sun Packaging, Inc.
Westfield, Indiana
Permit Reviewer: MES

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**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORTING FORM**

Source Name: Sun Packaging, Inc.
Source Address: 17728 Sun Park Drive, Westfield, Indiana 46074
FESOP No.: F 057-6168-00047

A separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit.
Attach a signed certification to complete this report.

Stack/Vent ID:

Equipment/Operation:

Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit:
(ex: 2500 pounds per day, 300 hours per year, 5000 gallons per month)

Determination Period for this Parameter:
(ex: 365-day rolling sum, fixed monthly rate)

9 Permit Has No Rate Limitations for this Parameter.

Content Restriction for this Parameter:
(ex: maximum of 40 percent VOC in inks, 0.5 percent sulfur content)

Demonstration Method for this Parameter:
(ex: MSDS, Supplier, material sampling & analysis)

9 Permit Has No Content Limitations for this Parameter.

Comments:

Sun Packaging, Inc.
Westfield, Indiana
Permit Reviewer: MES

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**OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Sun Packaging, Inc.
Source Address: 17728 Sun Park Drive, Westfield, Indiana 46074
FESOP No.: F 057-6168-00047
Facility: Each of the Three (3) Printing Presses
Parameter: VOC Delivered to the Presses
Limit: 2.00 Tons Per Month Per Press

Year: _____

Month	Press #1	Press #2	Press #3
	VOC (tons)	VOC (tons)	VOC (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Sun Packaging, Inc.
Source Location:	17728 Sun Park Drive, Westfield, IN 46074-9536
County:	Hamilton
SIC Code:	2673
Operation Permit No.:	057-6168-00047
Operation Permit Issuance Date:	October 17, 2000
Revision No.:	057-16087-00047
Permit Reviewer:	Allen R. Davidson

On June 5, 2002, the Office of Air Quality (OAQ) received an application from Sun Packaging, Inc. relating to the removal of two conditions which are in fact not applicable. One condition is not applicable since the emission source's potential to emit is lower than the thresholds which make it applicable. The other condition relates to particulate matter from an emission unit which does not emit particulate matter.

History

Sun Packaging, Inc. was issued a federally enforceable state operating permit (FESOP) for flexographic printing operations on October 17, 2000. An administrative amendment correcting a clerical error was issued on November 8, 2000. This application is the second revision to the permit.

The following changes to the FESOP are being proposed:

C.13 Emission Reporting [326 IAC 2-6]

~~a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year). The annual statement must be submitted to:~~

~~_____ Indiana Department of Environmental Management,
_____ Data Support Section, Office of Air Management,
_____ 100 North Senate Avenue, P.O. Box 6015
_____ Indianapolis, Indiana 46206-6015~~

~~b) This annual emission statement required by this permit shall be timely if:~~

~~_____ 1) Delivered by U.S. mail and postmarked on or before the date it is due; or~~

~~_____ 2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.~~

[This condition has been removed from the permit.]

D.1.4 Visible Emissions Notations

~~(a) Daily visible emission notations of the three (3) printing press stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether~~

~~emissions are normal or abnormal:~~

- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
 - ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
 - ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
 - ~~(e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.~~
- [This condition has been removed from the permit.]**

Furthermore, all instances of "Office of Air Management" in the permit conditions have been amended to read "Office of Air Quality" and all instances of "OAM" have been changed to read "OAQ."

Enforcement Issues

There are no enforcement actions pending against this emission source.

Stack Summary

Stack information will not be changed as a result of this revision.

Recommendation

The staff recommends to the Commissioner that the revision be approved as a minor permit revision. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 5, 2002.

Emission Calculations

Emissions will not be changed as a result of this revision.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Emissions are not expected to change as a result of this revision. However, the frequency of monitoring will be reduced if the revision is approved. Rule 326 IAC 2-8-11.1(d)(1) requires that the application be processed as a minor permit revision.

County Attainment Status

The source is located in Hamilton County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Hamilton County has been designated as attainment or unclassifiable for ozone and for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

This source is not a major source for Prevention of Significant Deterioration, 326 IAC 2-2. No attainment regulated pollutant has the potential to emit at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. The flexographic printing facilities are not subject to Subpart QQ as these presses are not rotogravure.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 40 CFR Part 63) applicable to this source. NESHAP Subpart KK is not applicable since the source is not classified as a major HAP source, and it does not require synthetic limits to be a minor HAP source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it does not have the potential to emit more than one hundred (100) tons per year of any pollutant specified in the rule.

State Rule Applicability - Three (3) Flexographic Printing Presses

326 IAC 5-1 (Visible Emissions Limitations)

This facility does not emit particulate matter. There will be no visible emissions from this facility.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the total amount of VOC emissions from each of the three (3) printing presses shall be limited to 6.0 tons per month. Therefore, the requirements of 326 IAC 2-7, do not apply.

326 IAC 8-5-5 (Graphic arts operations)

Since the emission source has potential emissions more than 25 tons per year of VOC, 326 IAC 8-5-5 is potentially applicable. However, since the source has agreed to limit VOC emissions from each printing press to 24.0 tons per year, the source is exempt from the requirements of this rule.

Conclusion

The operation of this emission source shall be subject to the conditions of the attached minor permit revision, No. 057-16087-00047.